## REMARKS

In accordance with the foregoing, claims 1-8 have been amended. Claim 10 has been added. Therefore, claims 1-10 are pending and under consideration.

In the Office Action, starting at page 2, numbered paragraph 4, claims 1-9 were rejected under 35 U.S.C. § 102 in view of Kajiwara (Japanese Patent 08-137508). This rejection is traversed and reconsideration is requested.

Independent claims 1-8 each recite "transfer function (or functions) assumed in advance" (e.g., claim 1, line 6) and "identifying one or more parameters of the transfer function" (e.g., claim 1, lines 7-8). The claims do not recite that the transfer function is modified. In fact, since only the "parameters of the transfer function" are identified, the claims do not encompass modification of the transfer function, only the identified parameters are available for modification.

In contrast, Kijiwara described a "dynamic model which outputs the output operation data obtained by the transfer function ... the output operation data outputted from the dynamic model to be inputted at least and to correct the transfer function of a dynamic model based on the interrelation between both data" (paragraph [0036], lines 3-7). The dynamic model described in Kijiwara is based on the transfer function and modified (or corrected) the transfer function to form the dynamic model by comparing interrelationships between two data sets. Therefore, Kijiwara does not anticipate a "transfer function (or functions) assumed in advance" (e.g., claim 1, line 6) and "identifying one or more parameters of the transfer function" (e.g., claim 1, lines 7-8) as recited in the claims because Kijiwara modified the transfer function to obtain the dynamic function.

In addition, the claimed invention provides benefits over what is described in Kijiwara. As well understood by one skilled in the art, Kijiwara depends on comparing two datasets, and using the comparison to formulate a dynamic function. This technique would not scale well to increases in data, because the operational time and operational costs increase dramatically as the amount of data in the data sets (both of which are, according to the description in Kijiwara, subject to processing) increase. On the other hand, because the claims do not modify the transfer function, the claims save both time and money when compared to the technique described in Kijiwara and thus fulfills a need not met by what has been described in Kijiwara. Therefore, what is recited in the claims is not obvious in view of Kijiwara.

Therefore, for the reasons discussed above, it is submitted that claims 1-8 are patentably distinguishable over Kijiwara.

Claim 9 recites "generating a controlled-object model ... from a transfer function determined prior to said generating and optimum parameters derived from the controlled variables and at least one error in an output of the transfer function" at lines 3-6. For the reasons discussed above, it is submitted that claim 9 is patentably distinguishable over Kijiwara.

Claim 10 recites "the transfer function is not modified while generating the controlled-object model" at lines 1-2. For the reasons discussed above, it is submitted that claim 10 is patentably distinguishable over Kijiwara.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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